

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

*IN RE CATTLE AND BEEF ANTITRUST
LITIGATION*

Case No. 0:20-cv-01319 (JRT/JFD)

This Document Relates To:

All Actions

**DECLARATION OF JARROD GILLIG IN SUPPORT OF
DEFENDANTS' RESPONSE TO PLAINTIFFS'
MOTION TO COMPEL THE PRODUCTION OF DATA AND DOCUMENTS**

I, Jarrod Gillig, declare pursuant to 28 U.S.C. § 1746, that:

1. I am currently the President of Cargill Meat Solutions Corporation's ("CMS") Business Operations and Supply Chain, North America Protein (collectively, "Cargill"). I submit this declaration in opposition to Plaintiffs' Motion to Compel the Production of Data and Documents. I have personal knowledge of the facts set forth below.

2. CMS currently runs four harvest plants (slaughter plants) that slaughter and fabricate primarily fed cattle into boxed beef and two harvest plants (slaughter plants) that slaughter and fabricate primarily non-fed cattle (*e.g.*, culled dairy cows) but also some fed cattle.

3. Separate from its six slaughter plants, CMS also currently runs three plants in the United States that further process boxed beef into case-ready beef products. One of the case-ready plants (Marshall, Missouri) also produces pork case-ready products as well as beef products containing additional ingredients.

4. The three case-ready plants are at separate physical locations from CMS's six beef slaughter plants.

5. The case-ready plants do not deal with live cattle or cattle harvesting (slaughter) activities. They purchase boxed beef and (at the Marshall plant) other protein inputs and other ingredients to produce case-ready beef and other further-processed protein products. CMS has purchased boxed beef from third parties, as well as from its own slaughter plants, as inputs into case-ready beef.

6. CMS's beef slaughter plants and case-ready plants employ entirely different plant-level personnel, including plant-level managers. Also, within CMS, one operations lead manages the operations related to the beef slaughter plants, and a different operations lead manages the case-ready plant operations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 3, 2022, in WICHITA, KS.



Jared Gillig